

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

*Southern District of Texas  
FEB 05 2018  
David J. Bradley, Clerk of Court*

In re: \* Chapter 11

LOCKWOOD HOLDINGS, INC., *et al.*, \* Case No. 18-30197 (DRJ)

Debtors. \* Jointly Administered

\* \* \* \* \*

**NOTICE OF RECLAMATION DEMAND**  
**OF KEDDCO MFG. INC.**

**TO THE DEBTORS AND ALL INTERESTED PARTIES:**

PLEASE TAKE NOTICE that Keddco Mfg. Inc. (“**Keddco**”), by and through its undersigned counsel, hereby submits this notice of delivery of a written demand, pursuant to §§ 503 and 546 of 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”), and § 2-702 of the Uniform Commercial Code, on the above-captioned debtors and debtors-in-possession (the “**Debtors**”) to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were sold in the ordinary course of Keddco’s business and delivered on credit terms to, and received by, the Debtors during the 45 days prior to the filing of the Debtors’ bankruptcy petitions. Keddco understands that the Debtors were insolvent at the time it received delivery of the Goods. Keddco attaches as Exhibit A and incorporates by reference herein, a copy of its formal reclamation demand letter it served on the Debtors on January 26, 2018, together with the related invoices identifying the Goods subject to reclamation. In exercising its reclamation rights, Keddco does not waive, and hereby expressly reserves, any and all of its rights or remedies or claims it may have under any and all applicable laws and in equity. Further, Keddco expressly reserves and preserves its right to assert an administrative expense pursuant to section 503(b)(9) of

Bankruptcy Code, for all goods delivered by Keddco to the Debtors within the 20 days immediately preceding the commencement of the Debtor's chapter 11 case.

Respectfully submitted:

Date: 2/1/2018

WHITEFORD, TAYLOR & PRESTON, LLP

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